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ACTING ATTORNEY GENERAL OF NEW JERSEY
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Attorney for the Defendants, Honorable Bonnie J. Mizdol,
P.J.Fam., Honorable Margaret Foti, J.S.C., Governor Christopher
James Christie, and Prosecutor John L. Molinelli.

By: Kristen N. Collar
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
VICINAGE OF NEWARK

DENNIS MAZZETTI,	:	HON. KEVIN MCNULTY, U.S.D.J.
	:	
Plaintiff,	:	Civil Action No. 2:14-cv-08134-
	:	KM-MAH
v.	:	
	:	<u>Civil Action</u>
THE NEW JERSEY DIVISION OF	:	
CHILD PROTECTION AND	:	DEFENDANT'S NOTICE OF MOTION TO
PERMANENCY, CHRISTOPHER JAMES	:	SET ASIDE DEFAULT PURSUANT TO
CHRISTIE, LISA VON PIER,	:	FED. R. CIV. P. 55(C), AND FOR
ALLISON BLAKE, BONNIE J.	:	A THIRTY DAY EXTENSION OF TIME
MIZDOL, MARGARET FOTI,	:	IN WHICH TO ANSWER, MOVE OR
VIRGINIA A. LONG, ELLEN	:	OTHERWISE RESPOND TO
BUCKWALTER, JOHN L. MOLINELLI,	:	PLAINTIFF'S COMPLAINT PURSUANT
KIMBERLY ROBERTS, ERICA	:	TO FED. R. CIV. P. 6(b)(1)(B)
ZAPATA, and JOHN DOES 1-15,	:	
	:	
Defendants.	:	(Electronically Filed)

To: CLERK OF THE COURT

Kenneth J. Rosellini, Esq.
636A Van Houten Avenue
Clifton, New Jersey 07013
Attorney for Plaintiff

PLEASE TAKE NOTICE that on Monday, April 6, 2015, or at such other time as it may please the Court, the undersigned, John J. Hoffman, Acting Attorney General of New Jersey, by Kristen N. Collar, Deputy Attorney General, on behalf of Defendants, Governor Christopher James Christie and Prosecutor John L. Molinelli, shall move before the Honorable Kevin McNulty, U.S.D.J., in the United States District Court House, Newark, New Jersey, for an Order setting aside the entry of default against Defendants, Governor Christopher James Christie and Prosecutor John L. Molinelli, pursuant to Fed. R. Civ. P. 55(c), and for an Order for a thirty (30) day extension of time in which to Answer, Move, or Otherwise Respond to Plaintiff's Complaint pursuant to Fed. R. Civ. P. 6(b)(1)(B). Defendants will rely on the Certification of Kristen N. Collar, Deputy Attorney General, filed simultaneously with this Notice of Motion.

It is respectfully requested that the Court rule upon the moving papers submitted, without requiring appearance of counsel, pursuant to Fed. R. Civ. P. 78, unless opposition is received.

A proposed form of Order is attached hereto.

JOHN J. HOFFMAN
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Kristen N. Collar
Kristen N. Collar
Deputy Attorney General

Dated: February 27, 2015